

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
PROGRESS POLLUTION REPORT**

**I. HEADING**

**Date:** January 4, 1995

**From:** Kevin Matheis, On-Scene-Coordinator  
USEPA, REGION II



**To:**

J. Fox, EPA	W. Muszynski, EPA
K. Callahan, EPA	G. Pavlou, EPA
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J. Rotola, EPA	ERD, Washington, (E-Mail)
M. Randol, EPA	M. Basile, EPA N. Falls
E. Schaaf, EPA	P. Simon, EPA
E. Kissel, EPA	S. Becker, EPA
I. Purdy, EPA-HWCB	J. Reidy, EPA-HWFB
R. Burns, EPA-OIG	M. O'Toole, NYSDEC
A. Rockmore, NYSDEC	F. Shattuck, NYSDEC IX
TAT	

**Subject:** Frontier Chemical Processes, Inc. (Tank Action), Niagara Falls, Niagara County, NY - Cyanides, Corrosives, Halogenated & Non-Halogenated Solvents

**POLREP NO:** Eight (8)

**II. BACKGROUND**

<b>SITE/SPILL NO.:</b>	CD
<b>D.O. NO.:</b>	2001-02-034
<b>RESPONSE AUTHORITY:</b>	CERCLA/SARA
<b>NPL STATUS:</b>	Non-NPL
<b>ERCS START DATE:</b>	May 16, 1994
<b>ERCS COMPLETION DATE:</b>	August 15, 1994
<b>APPROVAL STATUS:</b>	Authorization of Funding from AA OSWER Elliott P. Laws
<b>STATUS OF \$2 MILLION/ 12 MONTH EXEMPTION</b>	
<b>ACTION MEMORANDUM:</b>	Signed March 30, 1994
<b>CONSENT ORDER STATUS:</b>	Signed by Regional Administrator
<b>Effective Date:</b>	July 11, 1994
<b>Index Number:</b>	II-CERCLA-94-0205
<b>DE MINIMIS ORDER STATUS:</b>	Signed by Regional Administrator
<b>Effective Date:</b>	December 15, 1994
<b>Index Number:</b>	II-CERCLA-94-0206
<b>UNILATERAL ORDER STATUS:</b>	Signed by Regional Administrator
<b>Effective Date:</b>	September 30, 1994
<b>Index Number:</b>	II-CERCLA-94-0224 (Unilateral Order issued to non- consenting, non-de minimis PRPs)

### III. RESPONSE INFORMATION

#### A. Actions Taken

1. Transportation of waste to CERCLA approved off-site disposal facilities continues. Attached to this POLREP is a table of shipments through December 25, 1994.
2. The NEIC microfiche contractor has completed microfiching. An estimated 130,000 records have been copied by completion of the filming.
3. Personnel from the NYSDEC regional office were on-site December 13 to conduct a plant inspection. The OSC provided a comprehensive tour to the NYSDEC in anticipation of completed demobilization by the end of December.
4. The NYSDEC had approximately 10 personnel on-site on December 28 to remove various enforcement documents consisting of 300 file boxes of information. The NYSDEC has removed the documents from the site and put them into secure off-site storage.
5. The OSC has had communication with the property owner of the site. The owner has expressed interest in continuing security at the site after the PRP contractor and EPA demobilizes. EPA will meet with the property owner approximately one-week prior to demobilization to coordinate the transfer of the keys to the site. NYSDEC will also be provided with keys to the property.
6. During the period of November 28 through December 11, 1994, tank contents were removed from tanks associated with the fuels blending areas and the wastewater treatment systems. Tables 1 through 4 contain summaries of tank contents removed from the Site, which were transported off-site to the Treatment, Storage, and Disposal Facilities (TSDF's) over this period; LWD, Inc. (Table 1), Petro-Chem (Table 2), CECOS, Inc. (Table 3), and Calgon Carbon Corporation, Inc. (Table 4). In addition, other waste streams were sent to Chemical Waste Management (CWM) for treatment and disposal (Table 5). These wastes consisted of filter cloths and dried filter cake from the filter press (removal was initiated during the previous period) and sludge from T-72, T-73, and T-106. The total volume of liquid waste sent off-site to these TSDF's was 189,067 gallons (Tables 1 through 3).
7. On December 7, 1994, the initial set of tanks that were previously emptied and cleaned, were inspected by the OSC and the PRP Designated Coordinator. The following tanks were inspected: R301, R302, T301, T302, T304, T305 and T306. Upon their inspection, these tanks were deemed to be sufficiently clean with regards to the intent of the AOC. Two tanks were determined to require minimal follow-up cleaning (T306 and R301), which were subsequently addressed by LES.

8. During the period of December 12 through December 25, 1994, tank contents were removed from tanks associated with the fuels blending areas and the wastewater treatment systems. Table 1A contains a summary of tank contents and wastes removed from the Site, then transported off-site to the TSDF's. Wastes sent to CWM consisted of piping associated with the cyanide area and other miscellaneous areas, and used PPE. The sludge wastes from the fuels blending tanks were removed and placed in roll-off boxes for future off-site transport and incineration at LWD, Inc. These sludge wastes had not yet been shipped off Site. The total volume of liquid waste sent off-site to these TSDF's were 17,023 gallons. Two spent Calgon Cyclesorb units were sent off Site to Calgon Carbon Corporation, Inc.
9. During the month of December, 1994, Cranbury/BB&L personnel continued operation of the Site wastewater treatment system. Rain water collected in the secondary containment areas and rinsates generated from tank and secondary containment cleaning were pumped through the on-site Calgon FP2 Cyclesorb treatment system to tanks T-1 and T-2. On December 22, 1994, Cranbury initiated a discharge of 100,000 gallons of wastewater from T-1 to the City of Niagara Falls POTW. Due to the elevated levels of constituents in the T-1 contents (with phosphorous as the limiting factor), the discharge was completed over a period of eight days. Prior to the discharge, BB&L received authorization from the City of Niagara Falls POTW.
10. On December 22, 1994, various tanks were inspected by the OSC and the PRP Designated Coordinator. The following tanks were inspected: F-A and F-B (sand filters), V-1 and V-2 (GAC vessels), T110, T112, T114, T307, and T101. All tanks had been cleaned by DIS, a LES subcontractor, with high pressure water and surfactant. During the inspection, all but three tanks were found to be sufficiently clean by the USEPA, with regards to the intent of the AOC. These tanks were identified as requiring follow-up cleaning (V-2, T112, and T101), which will be performed by LES.

#### **B. Future Actions**

1. The PRP contractor group will continue the removal of waste materials from the site for disposal at CERCLA approved disposal facilities.
2. The PRP contractor group will continue decontamination operations on all tanks and piping.

#### **C. Key Issues**

Notification of payment due letters to the consenting de minimis PRPs have been sent. The payment is due to EPA by January 15, 1995.

#### IV. COST INFORMATION:

The costs of the project are being borne by the PRPs under the AOC and de minimis order. The estimated costs of the project are anticipated to be approximately \$3.6 million. This figure does not represent past costs by EPA. The PRPs for the drum action are responsible for 50% of past costs incurred by EPA; the PRPs for the tank action are responsible for the other 50%.

**TABLE 1**  
**FRONTIER CHEMICAL - ROYAL AVENUE SITE**  
**SUMMARY OF WASTES SHIPPED TO LWD, INC.**

TANK ID	WASTE DESCRIPTION	MANIFEST ID #	DATE	VOLUME (GALLONS)
T101	Sludge	NY B 451321 2	11/28/94	4796
		NY B 451316 7	11/28/94	2877
T102	Blended Aqueous Liquids from Fuels Blending Tanks (T201-1209)	NY B 451338 3	12/01/94	4796
		NY B 451338 2	12/01/94	5276
		NY B 451344 6	12/02/94	4800
		NY B 451343 7	12/02/94	5200
		NY B 471576 6	12/05/94	4908
		NY B 451348 5	12/05/94	4675
		NY B 474969 6	12/05/94	4500
		NY B 418830 3	12/07/94	4950
		NY B 418831 2	12/07/94	4600
		NY B 418832 1	12/07/94	4798
		NY B 418833 9	12/09/94	1920

**Total: 58,296**

**TABLE 2**  
**FRONTIER CHEMICAL - ROYAL AVENUE SITE**  
**SUMMARY OF WASTES SHIPPED TO PETRO-CHEM, INC.**

TANK ID	WASTE DESCRIPTION	MANIFEST ID #	DATE	VOLUME (GALLONS)
T201	NAqL/S1	MI 3870365	11/29/94	3100
T207 (NAqL)/ T112 (S1)	NAqL/S1	MI 3870364	12/02/94	3800
T201, T203 & T206 (S1)/ T207 (NAqL)	NAqL/S1	MI 3870364	12/03/94	5000
T206 (S1)/ T207 (NAqL)	NAqL/S1	MI 3870363	12/05/94	4920
T209 (S1)/ T206 (S1)	NAqL/S1	MI 3870362	12/06/94	4500
T209 (S1)/ T206 (S1)	NAqL/S1	MI 3870361	12/07/94	5000
TT249 (S1)/(NAqL)/ T206 (S1)	NAqL/S1	MI 3870360	12/08/94	4733
T207 (NAqL)	NAqL	MI 3870359	12/09/94	4904
T215 (S1)/ T205 (NAqL)	NAqL/S1	MI 3870358	12/10/94	4700

**TOTAL: 40,657**

**TABLE 3**  
**FRONTIER CHEMICAL - ROYAL AVENUE SITE**  
**SUMMARY OF WASTES SHIPPED TO CECOS**

TANK ID	WASTE DESCRIPTION	MANIFEST ID #	DATE	VOLUME (GALLONS)
T-2	W.W.	NY B 451320 3	11/28/94	5500
		NY B 451315 8	11/28/94	5500
		NY B 451322 1	11/28/94	5500
		NY B 675744 3	11/28/94	5500
		NY B 675741 6	11/29/94	5500
		NY B 675736 2	11/29/94	5500
		NY B 675737 1	11/29/94	5500
		NY B 675743 4	11/29/94	5500
		NY B 418868 1	11/30/94	5000
		NY B 675740 7	11/30/94	5000
		NY B 451336 5	12/01/94	2310
		NY B 451337 4	12/01/94	5500
		NY B 451341 9	12/02/94	4000
		NY B 451340 1	12/02/94	5500
T119	Mq (OH)	NY B 675739 8	11/30/94	4979
T-108	Lime Slurry	NY B 451346 4	12/01/94	3325
T-111		NY B 471577 5	12/05/94	5000
		NY B 451342 8	12/02/94	5500

**TOTAL: 90,114**

**TABLE 4**  
**FRONTIER CHEMICAL - ROYAL AVENUE SITE**  
**SUMMARY OF WASTES SHIPPED TO CALGON CARBON**

TANK ID	WASTE DESCRIPTION	MANIFEST ID	DATE	WEIGHT (LBS)
V-1	Spent Carbon	PAC 3526854	11/29/94	45,300
V-2	Spent Carbon	PAC 0831493	12/01/94	45,900

**TABLE 5**  
**FRONTIER CHEMICAL - ROYAL AVENUE SITE**  
**SUMMARY OF WASTES SHIPPED CWM**

TANK ID	WASTE DESCRIPTION	MANIFEST ID	DATE	WEIGHT (BU - VDS)
NA	CN Filter Cake/Cloths	NY B 675738 9	11/30/94	20
NA	"	NY B 7039008	12/07/94	20
NA	CN Filter Cake/Cloths & Sludge from T72/T73, T106	NY B 7038999	12/07/94	20



**TABLE 1A.**

**FRONTIER CHEMICAL - ROYAL AVENUE SITE  
SUMMARY OF WASTES SHIPPED OFF-SITE  
PERIOD OF DECEMBER 12, 1994 THROUGH DECEMBER 26, 1994**

TANK I.D.	TSDF	WASTE DESCRIPTION	MANIFEST I.D.	DATE	VOLUME (GAL.)
T215	Petro-Chem	NAqL/SI	MI3870357	12/14/94	2,733
T307	Cyano-Kem	Sludge/Liquid	MI3120306	12/12/94	3,250
T110	LWD	Carbon Water	NYB4186348	12/12/94	4,380
		Miscellaneous	NYB4717845	12/12/94	4,200
		Rinsates	NYB4717863	12/12/94	2,480
N/A	CWM	Piping/PPE	NYB709342	12/12/94	20 cu.yd.